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Comment Received From: Collin Tateishi

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Re: Docket No. 17-EPIC-01 – Comments in Support for Affordable Housing Preference in CEC’s 2018-2020 EPIC Triennial Investment Plan

Additional submitted attachment is included below.



February 10, 2017

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 17-EPIC-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 17-EPIC-01 – Comments in Support for Affordable Housing Preference in CEC’s 2018-2020 EPIC Triennial Investment Plan

Dear California Energy Commission,

The California Housing Partnership Corporation (CHPC) strongly recommends prioritizing project proposals that include tailored solutions for affordable housing in the California Energy Commission’s (CEC) 2018-2020 EPIC Triennial Investment Plan. The 2015-2017 EPIC Triennial Investment Plan states that “solutions and technologies must be deployed at a scale and in a way that reaches all sectors, including traditionally hard-to-reach sectors, such as affordable housing and small business.”¹ As described further below, solutions and technologies must be tailored for and demonstrated specifically on affordable housing properties to ensure that these solutions and technologies will be deployed in this sector. CHPC further supports the CEC’s approach of providing a preference for affordable housing project proposals in EPIC GFO-16-309 and recommends applying this approach generally to EPIC solicitations.

CHPC is a private nonprofit that provides statewide technical assistance and leadership on affordable rental housing finance issues to nonprofit and local government housing agencies. Our 13 financial consultants have helped these agencies leverage more than \$12 billion in public and private financing to create and preserve more than 60,000 affordable rental homes. Our sustainable housing policy experts convene the Green Rental home Energy Efficiency Network (GREEN), a network of over 80 mission-driven affordable rental housing, environmental and sustainable energy organizations working to increase access to energy efficiency, clean energy and water conservation resources for affordable rental properties in California. We also co-lead California’s chapter of Energy Efficiency for All, a national partnership dedicated to linking the energy and housing sectors together to tap the benefits of the clean energy economy for millions of low-income families. In California, GREEN and EEFA work together with affordable rental housing property owners and partners to ensure that low-income households benefit from cleaner, healthier and more affordable housing.

¹ Application of the California Energy Commission for Approval of Electric Program Investment Charge Proposed 2015 through 2017 Triennial Investment Plan, April 28, 2014. Page 20.

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CHPC commends the CEC for including a preference for energy and water management demonstration project proposals tailored for affordable housing in the EPIC solicitations generally. CHPC also encourages the CEC to consider these comments as it solicits information needed to develop the 2018-2020 EPIC Triennial Investment Plan.

1. Demonstrations of energy and water management **technologies and business models** are needed specifically for affordable rental housing. These properties have specific financing structures, constraints for disrupting tenant usage and load profiles that may challenge technologies and business models already demonstrated in commercial or residential contexts. Affordable housing financial structure and business model barriers to energy program adoption were recently documented in the CEC's 350 Low-Income Energy Barriers Report (December 2016).
2. Demonstration projects that enable affordable rental housing owners and low-income families maintain **energy and water affordability** are essential. Unless the CEC prioritizes projects that demonstrate energy and water management solutions for affordable homes, energy and water costs for nonprofit owners and low-income families will increase as California integrates more renewable energy and faces ongoing water quality and supply challenges.
3. Funding is needed for **innovative solutions to combined water-energy efficiency** challenges. Streamlining financial and technical resources to address the water-energy nexus can create energy, water and financial benefits for nonprofit owners and low-income families in affordable rental housing.

More than 1.5 million low-income Californians lack an affordable home. Facing high and rising housing costs, families are forced to make impossible choices between paying rent and other essential needs like transportation, food and healthcare. This grant can make a tremendous difference in the lives of thousands of Californians by enabling innovative demand management solutions to reduce energy and water costs for nonprofit owners and low-income families living in affordable rental housing.

Sincerely,



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